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NAME OF COMMITTEE (In Full)
Planned Parenthood Action Fund, Inc.

FEC IDENTIFICATION NUMBER
C90005471

Mailing Address 123 William St, 10th Floor

City State ZIP Code
New York NY 10038

March 17, 2017

Carolina Mongeon
Senior Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
Washington D.C. 20463

Re: ID number C90005471, October Quarterly Report (07/01/2016-09/30/2016)

Dear Ms. Mongeon:

We received your letter of February 14, 2017 requesting additional information on the October Quarterly Report (07/01/2016-09/30/2016) filed by Planned Parenthood Action Fund, Inc. (the Action Fund).

Question 1 of your letter asks Action Fund to amend the Report to itemize donors who contributed in excess of \$200 to the organization. FEC regulations require reports of independent expenditures to disclose only those contributors to the organization who made contributions in excess of \$200 "for the purpose of furthering the reported independent expenditure." 11 CFR 109.10(e)(1)(vi). Action Fund had no contributors who made such contributions. Therefore no amendment of the Report is required.

Question 2 of your letter asks whether an Independent Expenditure Report (I.E. Report) was required, but not filed for an \$185.02 independent expenditure made on September 13, 2016 in opposition to Richard Burr for Senate (North Carolina) in the general election. This independent expenditure was reported to the Federal Election Commission (FEC) on an I.E. Report on October 20, 2016 (FEC-1114829), in addition to being reported on the October Quarterly Report. This expenditure did not trigger a 24/48-hour reporting threshold until after the period covered by the quarterly report reviewed in your letter.

Question 3 of your letter asks whether the Action Fund failed to timely file an I.E. Report for independent expenditures totaling \$9,034.07 made between August 18, 2016-September 9, 2016 in support of Hillary Clinton or in opposition of Donald Trump for U.S. President in the general election.

Three of these expenditures totaling \$2,053.66 (Transactions 57627428, 57627429, 57627430) were reported to the FEC on September 22, 2016 on the Action Fund's September 22 Report (the Sept. 22 Report) (FEC-1101090). At the time the \$2,053.66 in expenditures were made on August 18 and 22, 2016, these low dollar expenditures alone did not trigger the \$10,000 reporting threshold in the given election, pursuant to 11 C.F.R. 109.10(c). On September 20, 2016, the Action Fund made additional expenditures in that election totalling \$15,506.37 (Transactions 57647431, 57627432, 57627433); accordingly, the Action Fund filed a Independent Expenditure Report on September 22, 2016 (FEC-1101090) in compliance with 11 C.F.R. 109.10(c), disclosing \$17,560.03 in expenditures on time.

Due to a clerical error, seven of the expenditures noted in your letter totaling \$6,980.41 (Transactions 57633557, 57633558, 57633560, 57633561, 57633563, 57633584, 57633564), were inadvertently omitted from the Sept. 22 Report. On October 20, 2016, the Action Fund realized this clerical error, and the same day reported these expenditures, with other independent expenditures that totaled \$10,092.57 (Transactions 57633571, 57633572, 57633587, 57633580, 57633578, 57633579, 57633602, 57633603, 57633565, 57633566, 57633581, 57633582), on the Action Fund's I.E. Report (the Oct. 20 Report) (FEC-1112055). In addition, the \$6,980.41 in expenditures were properly disclosed on the Action Fund's October Quarterly Report filed on October 13, 2016 (FEC-1105380) and were therefore available to the public prior to the October 15th quarterly deadline. These low dollar expenditures -- \$6,980.41,

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which represent less than 0.8 % of the total expenditures Action Fund was required to report in this election overall -- were made available to the public on a periodic report 27 days and on an I.E.Report 20 days before the relevant election.

In conclusion, to ensure that minor inadvertent omissions like those referenced here, are avoided in the future, the Action Fund is undertaking a thorough review of its reporting procedures as part of its year-end review.

Yours sincerely,

Sarah Rozensky
Attorney for Planned Parenthood Action Fund Inc.